

IGNACIA S. MORENO
Assistant Attorney General
Environment & Natural Resources Division
United States Department of Justice

DAVID B. GLAZER (D.C. 400966)
Natural Resources Section
Environment & Natural Resources Division
United States Department of Justice
301 Howard Street, Suite 1050
San Francisco, California 94105
TEL: (415) 744-6491
FAX: (415) 744-6476
e-mail: david.glazer@usdoj.gov

Attorneys for Federal Defendant

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PLANNING ASSOCIATION FOR THE RICHMOND,

No. C-06-02321-SBA

Plaintiffs,

**STIPULATION OF THE PARTIES AND
ORDER MODIFYING SETTLEMENT
AGREEMENT DEADLINE**

U.S. DEPARTMENT OF VETERANS
AFFAIRS.

Date: N/A

Defendant

Time: N/A

Time: N/A

Courtroom No. N/A

1 Plaintiffs Planning Association for the Richmond and Friends of Lands End and Defendant U.S.
2 Department of Veterans Affairs hereby stipulate to a minor modification to the schedule set out in the
3 parties' Settlement Agreement, approved by the Court on June 6, 2008 [Dkt. #56].

4 Paragraph 14 of the Settlement Agreement provides that the Defendant will complete an
5 Institutional Master Plan ("IMP") and supporting Environmental Impact Statement ("EIS") addressing
6 potential projects under consideration for the San Francisco Veterans Affairs Medical Center Campus
7 within 30 months of the date the Court approves the Settlement Agreement. The IMP and EIS are
8 therefore due by December 6, 2010.

9 The parties have discussed the need for an extension of the due date for the IMP and EIS and
10 agree that Defendant may have until March 31, 2011 to complete those documents.

11 Accordingly, the parties hereby stipulate, subject to Court approval, that the date by which the
12 draft IMP and EIS are otherwise due to be circulated for public comment under Paragraph 14 of the
13 Settlement Agreement may be extended to March 31, 2011.

14 SO STIPULATED:

15 FOR PLAINTIFFS

16 Dated: July 12, 2010

/s/Sharon E. Duggan
SHARON E. DUGGAN
[Concurrence obtained per General Order 45.X]
Law Offices of Sharon E. Duggan
370 Grand Avenue, Suite 5
Oakland, California 94610
Telephone: (510) 271-0825
Facsimile: (510) 271-0829
E-mail: foxsduggan@aol.com

21 FOR THE DEFENDANT

22 Dated: July 12, 2010

IGNACIA S. MORENO
Assistant Attorney General
Environment & Natural Resources Division

/s/David B. Glazer
DAVID B. GLAZER
Natural Resources Section
Environment & Natural Resources Division
United States Department of Justice
301 Howard Street, Suite 1050
San Francisco, California
Tel: (415) 744-6491

1 Fax: (415) 744-6476
2 E-mail: David.Glazer@usdoj.gov

3
4
5 *Attorneys for Federal Defendant*

6
7
8
9
10 **ATTORNEY ATTESTATION OF CONCURRENCE**

11
12 I hereby attest that I have obtained Plaintiffs' concurrence in this filing, indicated by the
13 signature of Plaintiffs' counsel represented by a "conformed" signature ("s/") within this e-filed
14 document.

15 Dated: July 12, 2010 */s/*
16 DAVID B. GLAZER

17
18
19 **[PROPOSED] ORDER**

20 Upon consideration of the Stipulation set out above, it is hereby ORDERED that the Stipulation
21 is APPROVED and that the date by which the IMP and EIS are otherwise due under Paragraph 14 of the
22 Settlement Agreement may be extended to March 31, 2011.

23
24 Dated: 7/19/10

25
26
27
28 
SAUNDRA BROWN ARMSTRONG
United States District Judge

CERTIFICATE OF SERVICE

I, David B. Glazer, hereby certify that, on July 12, 2010, I caused the foregoing to be served upon counsel of record through the Court's electronic service system.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 12, 2010

/s/David B. Glazer
David B. Glazer